

**Amendments to the Drawings:**

New FIG. 2 is submitted herewith for approval.

Attachment: Replacement Sheet

**REMARKS**

Claims 1-15 are pending.

Claims 1-5, 7-8, and 10-15 stand rejected under 35 USC §103(a) as being allegedly unpatentable over Stier (US 6,591,258) in view of Reddy (US 6,629,096).

Claims 1-5, 7-8, and 10-15 stand rejected under 35 USC §103(a) as being allegedly unpatentable over Stier (US 6,591,258) in view of Reddy (US 6,629,096).

Claim 6 stands rejected under 35 USC §103(a) as being allegedly unpatentable over Stier (US 6,591,258) in view of Reddy (US 6,629,096) and further in view of Powers (US 6,513,027).

Claim 9 stands rejected under 35 USC §103(a) as being allegedly unpatentable over Stier (US 6,591,258) in view of Reddy (US 6,629,096) and further in view of Sferro (US 6,230,066).

**Changes in the Claims:**

Claims 1, 4, and 15 have been amended.

Claim 2 has been canceled.

Claims 16-20 have been added in this application to further particularly point out and distinctly claim subject matter regarded as the invention.

Amendments to claims 1, 4, and 15 are supported by the specification, specifically, at paragraphs [0007] and [0009].

Claims 16-20 are supported by the present specification by Appendix A, B, C, and D.

No new matter has been added.

**Changes in the Drawings:**

New FIG. 2 has been added.

FIG. 2 illustrates an architecture of the knowledge management system in accordance with an embodiment.

Support for FIG. 2 derives from applicant's disclosure, and specifically from Appendix A, B, C, and D.

No new matter has been added.

**Changes in the Specification:**

The specification has been amended in order to incorporate the description of FIG. 2, whose subject matter appears in the applicant's disclosure, and specifically from Appendix A, B, C, and D as well. No new matter has been added.

**Rejection under 35 USC §103(a) – claims 1-5, 7-8, and 10-15**

Claims 1-5, 7-8, and 10-15 stand rejected under 35 USC §103(a) as being allegedly unpatentable over Stier (US 6,591,258) in view of Reddy (US 6,629,096). This rejection is respectfully traversed.

Under MPEP §706.02(j), in order to establish a prima facie case of obviousness required for a §103 rejection, three basic criteria must be met: (1) there must be some suggestion or motivation either in the references or knowledge generally available to modify the reference or combine reference teachings (MPEP §2143.01), (2) a reasonable expectation of success (MPEP §2143.02), and (3) the prior art must teach or suggest all the claim limitations (MPEP §2143.03). See In re Royka, 490 F. 2d 981, 180 USPQ 580 (CCPA 1974).

Applicants respectfully submit that the proposed combination of Stier and Reddy does not teach or suggest the claim limitations of Claims 1-5, 7-8, and 10-15. Stier describes a method of managing knowledge in a knowledge base. The knowledge is stored in a plurality of existing knowledge objects having existing elements of information. See Col. 2, lines 63-64. In particular, the knowledge objects are defined by knowledge object types, and records are defined by record types. See Col. 8, lines 7-9. These **static** knowledge objects are particularly applied in the context of technical support environment where knowledge includes the symptoms and the causes of the problem. The knowledge base in Stier is grouped by objects and records and not by workflow.

Reddy describes a method for performing a mindflow process. The data warehouse 34 includes preset data items 36. The preset data items 36 represent information associated with the knowledge of workers. That knowledge is captured into a predetermined category.

In contrast, Claim 1 claims:

capturing existing knowledge with **user-defined templates** in a predetermined format of selected information categories grouped in a plurality of workflows;  
**abstracting the captured knowledge using meta data**;  
organizing the abstracted captured knowledge into an indexed database of information including links between related information, the indexed database structured according to the **abstracted captured knowledge**;  
acquiring new knowledge with the **user-defined templates**;  
capturing the new knowledge in the predetermined format; and  
updating the database to include the new information and links between the new information and related information.

Neither Stier nor Reddy teach or suggest capturing knowledge with **user-defined templates**. Reddy describes capturing information using a preset fixed template. FIG. 18 of Reddy describes a **predetermined and preset** process of determining the appropriate mapping of the knowledge item through a series of query to the knowledge worker. See Col.37, lines 1-53. Thus, the process taught by Reddy does **not** include **user-defined templates** but a process that already includes a **preset** sequence of queries to the knowledge worker. The knowledge worker in Reddy **cannot** define or modify the template.

Further, neither Stier nor Reddy teach or suggest **abstracting** the captured knowledge information using **meta data**. Reddy resorts to weighting factors for retrieval of knowledge items. See Col. 30, lines 10-31. Reddy does **not** abstract or transform the captured knowledge information using meta data.

Applicant therefore submits that the rejection based the Stier and Reddy references is improper and should be withdrawn. Thus, Applicant submits that claims 1-5, 7-8, and 10-15 recite novel subject matter which distinguishes over any possible combination of Stier and Reddy.

**Rejection under 35 USC §103(a) – Claim 6**

Claim 6 stands rejected under 35 USC §103(a) as being allegedly unpatentable over Stier (US 6,591,258) in view of Reddy (US 6,629,096) and further in view of Powers (US 6,513,027).

These rejections are respectfully traversed for at least the reason that each of the rejected claims ultimately depend on an above-discussed base claim. The arguments set forth above regarding the base claims are equally applicable here. The base claims being allowable, the dependent claims must also be allowable.

**Rejection under 35 USC §103(a) – Claim 9**

Claim 9 stands rejected under 35 USC §103(a) as being allegedly unpatentable over Stier (US 6,591,258) in view of Reddy (US 6,629,096) and further in view of Sferro (US 6,230,066).

These rejections are respectfully traversed for at least the reason that each of the rejected claims ultimately depend on an above-discussed base claim. The arguments set forth above regarding the base claims are equally applicable here. The base claims being allowable, the dependent claims must also be allowable.

**Conclusion**


For all of the above reasons, applicants submit that the amended claims are now in proper form, and that the amended claims all define patentable subject matter over the prior art. Therefore, Applicants submit that this application is now in condition for allowance.

**Request for allowance**

It is believed that this Amendment places the above-identified patent application into condition for allowance. Early favorable consideration of this Amendment is earnestly solicited. If, in the opinion of the Examiner, an interview would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the number indicated below.

Respectfully submitted,  
Lo IP Group

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